



February 5, 2021

The Honorable Jocelyn G. Boyd  
Chief Clerk and Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

**Re: Duke Energy Carolinas, LLC & Duke Energy Progress, LLC's Establishment of Solar Choice Metering Tariffs Pursuant to S.C. Code Ann. § 58-40-20, Docket Nos. 2020-264-E and 2020-265-E**

Dear Ms. Boyd:

The South Carolina Coastal Conservation League (CCL) urges the Commission to approve the stipulation and settlement with Duke Energy relating to the new Solar Choice Net Energy Metering (NEM) tariffs under the Energy Freedom Act. CCL is a nonprofit organization based in Charleston whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in its communities by working with individuals, businesses, and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians, including distributed energy resources.

CCL has long been an active participant in Public Service Commission proceedings in support of effective rates and policies and clean distributed energy resources. CCL was party to the settlement reached in establishing the current Net Energy Metering Methodology (Docket No. 2014-246-E) as well as in the dockets establishing the current net metering tariffs for Duke Energy Carolinas, Duke Energy Progress, and South Carolina Electric & Gas (now Dominion Energy South Carolina). CCL has also participated in the past five years of utility annual fuel clause filings in which the required amount of each utility's NEM Incentive is calculated. CCL is also a party to the on-going generic docket under the Energy Freedom Act relating to methodologies for valuing solar (Docket No. 2019-E-182).

CCL supported the passage of the Energy Freedom Act, which directs utilities and the Commission to develop and approve innovative rate structures that help customers manage their bills and reduce consumption in ways that contribute to reductions in peak demand. S.C. Code Ann. § 58-27-845(A). Duke Energy's proposed Solar Choice NEM tariff directly meets these goals.

Duke Energy's proposal takes advantage of time varying rates paired with smart thermostats—as contemplated in our agreement with the Company to pair these new tariffs with demand-side management and energy efficiency programs that will provide fair incentives for the value that this combination brings to the grid. Duke's proposed tariffs are an important

component of our overall agreement with the Company and, as a package, work together to satisfy the components of the Energy Freedom Act noted above. This new rate structure will equip customers with the information and capability to manage their electric bills in a manner that reduces utility peaks and will contribute to bill savings for all ratepayers. *See also* S.C. Code Ann. § 58-27-845(C) (in fixing rates, the Commission “shall consider whether rates are designed to discourage the wasteful use of public utility service”).

The proposed Solar Choice NEM tariffs also fulfill the Energy Freedom Act’s requirement that each utility “offer [] to each class of service a minimum of one reasonable rate option that aligns the customer’s ability to achieve bill savings with long-term reductions in the overall cost the electrical utility will incur in providing electric service, including, but not limited to, time-variant pricing structures.” S.C. Code Ann. § 58-27-845(D). Duke Energy’s Solar Choices NEM tariffs comply directly with this provision by providing a rate that “aligns the customer’s ability to achieve bill savings with long-term reductions in the overall cost the electrical utility will incur” using “time variant pricing structures.” As noted above, our agreement with Duke calls for innovative new demand side management and energy efficiency offerings to be paired with the new Solar Choice NEM tariffs that work together to accomplish the goals of the Energy Freedom Act. We appreciate Duke Energy’s willingness to participate in the stakeholder process and listen to stakeholder input in developing the proposed Solar Choice NEM tariffs. Duke Energy’s willingness to engage early with a broad array of stakeholders helped to achieve an innovative path forward that will provide benefits for customers who install distributed energy resources, nonparticipating customers, and the utility system as a whole.

Ratepayers—both rooftop solar customers and nonparticipants—have much to gain from approval of Duke’s proposed Solar Choice NEM tariffs. This new innovative rate design starts the process of customer load management on winter peaks while continuing to value distributed solar energy’s contribution to the grid. CCL is confident that the proposed tariffs, in combination with the other components of the settlement with Duke Energy, are fair and will help rooftop solar continue to grow in South Carolina.

Thank you for your time and consideration.

Sincerely,



Eddy Moore  
Energy and Climate Program Director  
S.C. Coastal Conservation League